

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

(1) CHRIST CENTER OF DIVINE )  
PHILOSOPHY, INC., )  
an Oklahoma Corporation )  
 )  
Plaintiff, )  
 )  
v. ) Case No. CIV-16-65-D  
 )  
(1) ELLEN VERONICA ELAM, )  
an Individual )  
 )  
Defendant. ) JURY TRIAL DEMANDED

**COMPLAINT**

COMES NOW, Plaintiff CHRIST CENTER OF DIVINE PHILOSOPHY, INC. (“Plaintiff”), by and through its attorneys, and states the following in support of its Complaint against Defendant, ELLEN VERONICA ELAM, an individual (“Defendant”).

**NATURE OF COMPLAINT**

1. This is an action for injunctive relief and monetary damages arising out of, inter alia, Defendant’s infringement and unauthorized use of Plaintiff’s copyrighted works.

**JURISDICTION AND VENUE**

2. This action arises under federal law seeking damages and injunctive relief for copyright infringement under the copyright laws of the United States. This Court has jurisdiction over the subject matter of this action under 17 U.S.C. § 101 *et seq.*, 28 U.S.C. § 1331 (federal question), and 28 U.S.C. § 1338 (copyright).

3. This court has personal jurisdiction over Defendant under 28 U.S.C. § 1391, because she has conducted business, continues to conduct business, and has caused damages to Plaintiff in this district.

### **THE PARTIES**

4. Plaintiff has as its principal place of business at 333 SW 29th Street, Oklahoma City, Oklahoma 73109 and has conducted business in Oklahoma and specifically the Federal Western District of Oklahoma. Plaintiff is a non-profit corporation organized and existing under the laws of the State of Oklahoma.

5. Upon information and belief, Defendant is an individual living at 401 N Findlay Avenue, Norman, Oklahoma, 73071, and specifically, in the Federal Western District of Oklahoma.

### **FACTUAL BACKGROUND**

6. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the book “Meditation/Ancient Teachings of the Masters” subject to U.S. Copyright Registration No. A 742095 and Renewal No. RE 931715.

7. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the text of the book “The Parables” subject to U.S Copyright Registration No. TX 7721917.

8. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Life after Death Part 1, et al.” subject to U.S. Copyright Registration No. SR 737188.

9. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Dreams Lecture 6/30/79” subject to U.S Copyright Registration No. SRu 1121446.

10. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the book “Looking That’s What You Will Find” subject to U.S Copyright Registration No. TX7-721-913.

11. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 1”, subject to U.S. Copyright Registration Application No. 1-3071958551.

12. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 2”, subject to U.S. Copyright Registration Application No. 1-3072068302.

13. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 3”, subject to U.S. Copyright Registration Application No. 1-3072068349.

14. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 4”, subject to U.S. Copyright Registration Application No. 1-3072068636.

15. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 5”, subject to U.S. Copyright Registration Application No. 1-3072068813.

16. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 6”, subject to U.S. Copyright Registration Application No. 1-3072068900.

17. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 7”, subject to U.S. Copyright Registration Application No. 1-3072069087.

18. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 8”, subject to U.S. Copyright Registration Application No. 1-3072069184.

19. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 9”, subject to U.S. Copyright Registration Application No. 1-3072101231.

20. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Rounds and Races Part 10”, subject to U.S. Copyright Registration Application No. 1-3072101430.

21. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Kingdom of Man & His Godself”, subject to U.S. Copyright Registration Application No. 1-3074863550.

22. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Twenty-Third Psalm”, subject to U.S. Copyright Registration Application No. 1-3074767477.

23. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “MEDITATION & KRYIA INITIATION”, subject to U.S. Copyright Registration Application No. 1-3074605082.

24. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “MEDITATION GIVEN IN TULSA”, subject to U.S. Copyright Registration Application No. 1-3074604782.

25. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Saturday Spring Retreat Kingdom Lecture”, subject to U.S. Copyright Registration Application No. 1-3072572260.

26. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “NO TITLE”, subject to U.S. Copyright Registration Application No. 1-3072209212.

27. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Friday Night Spring Retreat Kingdom Lecture”, subject to U.S. Copyright Registration Application No. 1-3072196193.

28. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “NO TITLE” also known as “5 Streams/Time of Refinement”, subject to U.S. Copyright Registration Application No. 1-3072195727.

29. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Parables # 1”, subject to U.S. Copyright Registration Application No. 1-3072101970.

30. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Parables # 3”, subject to U.S. Copyright Registration Application No. 1-3072101875.

31. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “LOVE”, subject to U.S. Copyright Registration Application No. 1-3072101517.

32. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Easter Lecture”, subject to U.S. Copyright Registration Application No. 1-3072101634.

33. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “LAW OF OPULANCE”, subject to U.S. Copyright Registration Application No. 1-3072101711.

34. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Parables # 2”, subject to U.S. Copyright Registration Application No. 1-3072101808.

35. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “Parable Of The Prodigal Son”, subject to U.S. Copyright Registration Application No. 1-3074997427.

36. Plaintiff is the owner by assignment of a copyrighted work created by Audle Allison, namely the sound recording of the performance of the lecture “MEDITATION”, subject to U.S. Copyright Registration Application No. 1-3075223552.

37. Upon information and belief, Defendant is an individual that has published and sold the book “Meditation Mastery with Audle Allison and Instructions of the Masters.”

38. Upon information and belief, Defendant is an individual that has published and sold the book “Audle Allison the Great American Swami.”

39. Upon information and belief, Defendant is an individual that has published and sold the book “Audle Allison the Great American Swami” (2<sup>nd</sup> Edition).

40. Plaintiff has previously demanded the Defendant to cease and desist infringement of the copyrighted works specified above and Defendant has continued to willfully infringe same.

**COUNT 1. INFRINGEMENT OF COPYRIGHT No. A 742095 and Renewal No.  
RE 931715**

41. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

42. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to the book “Meditation/ Ancient Teachings of the Masters.” The work is the subject of a valid US Copyright Registration and Renewal for which the Plaintiff is the current owner.

43. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce the book “Meditation/ Ancient Teachings of the Masters” and to distribute same to the public.

44. Defendant willfully infringed Plaintiff’s copyrighted work, the book “Meditation/ Ancient Teachings of the Masters” subject to U.S. Copyright Registration and Renewal, by copying and placing upon the market with the intent to sell a book titled “Meditation Mastery with Audle Allison and Instructions of the Masters.”

**COUNT 2. INFRINGEMENT OF COPYRIGHT No. A 742095 and Renewal No.  
RE 931715**

45. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

46. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to the book "Meditation/Ancient Teachings of the Masters." The work is the subject of a valid US Copyright Registration and Renewal for which the Plaintiff is the current owner.

47. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce the book "Meditation/Ancient Teachings of the Masters" and to distribute same to the public.

48. Defendant willfully infringed Plaintiff's copyrighted work, the book "Meditation/Ancient Teachings of the Masters" subject to U.S. Copyright Registration and Renewal by copying and placing upon the market with the intent to sell a book titled , "Audle Allison the Great American Swami."

**COUNT 3. INFRINGEMENT OF COPYRIGHT No. A 742095 and Renewal No.  
RE 931715**

49. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

50. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to the book "Meditation/

Ancient Teachings of the Masters.” The work is the subject of a valid US Copyright Registration and Renewal for which the Plaintiff is the current owner.

51. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce the book “Meditation/Ancient Teachings of the Masters” and to distribute same to the public.

52. Defendant willfully infringed Plaintiff’s copyrighted work, the book “Meditation/Ancient Teachings of the Masters” subject to U.S. Copyright Registration and Renewal by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami” (2<sup>nd</sup> Edition).

**COUNT 4. INFRINGEMENT OF COPYRIGHT No. TX 7721917**

53. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

54. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to the text of the book “The Parables.” The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

55. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce the text of the book “The Parables” and to distribute same to the public.

56. Defendant willfully infringed Plaintiff's copyrighted work, the text of the book "The Parables" subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 5. INFRINGEMENT OF COPYRIGHT No. TX 7721917**

57. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

58. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to the text of the book "The Parables." The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

59. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce the text of the book "The Parables" and to distribute same to the public.

60. Defendant willfully infringed Plaintiff's copyrighted work, the text of the book "The Parables" subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami" (2<sup>nd</sup> Edition).

**COUNT 6. INFRINGEMENT OF COPYRIGHT No. SR 737188**

61. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

62. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Life after Death Part 1, et al.” The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

63. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Life after Death Part 1, et al.” and to distribute same to the public in sound or written form.

64. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Life after Death Part 1, et al.” and subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 7. INFRINGEMENT OF COPYRIGHT No. SR 737188**

65. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

66. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound

recording of the performance of the lecture “Life after Death Part 1, et al.” The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

67. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Life after Death Part 1, et al.” and to distribute same to the public in sound or written form.

68. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Life after Death Part 1, et al.” subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami” (2<sup>nd</sup> Edition).

**COUNT 8. INFRINGEMENT OF COPYRIGHT No. SRu 1121446**

69. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

70. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Dreams Lecture 6/30/79.” The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

71. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Dreams Lecture 6/30/79” and to distribute same to the public in sound or written form.

72. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "Dreams Lecture 6/30/79" subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 9. INFRINGEMENT OF COPYRIGHT No. SRu 1121446**

73. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

74. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture "Dreams Lecture 6/30/79." The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

75. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce "Dreams Lecture 6/30/79" and to distribute same to the public in sound or written form.

76. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "Dreams Lecture 6/30/79" subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami" (2<sup>nd</sup> Edition).

**COUNT 10. INFRINGEMENT OF COPYRIGHT No. TX7-721-913**

77. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

78. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the book "Looking That's What You Will Find". The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

79. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce "Looking That's What You Will Find" and to distribute same to the public in sound or written form.

80. Defendant willfully infringed Plaintiff's copyrighted work, the text of "Looking That's What You Will" subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 11. INFRINGEMENT OF COPYRIGHT No. TX7-721-913**

81. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

82. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the book "Looking That's What You Will Find". The work is the subject of a valid US Copyright Registration for which the Plaintiff is the current owner.

83. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Looking That’s What You Will Find “ and to distribute same to the public in sound or written form.

84. Defendant willfully infringed Plaintiff’s copyrighted work, the text of “Looking That’s What You Will” subject to U.S. Copyright Registration by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami” (2<sup>nd</sup> Edition).

**COUNT 12. INFRINGEMENT OF COPYRIGHT Application No. 1-3071958551**

85. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

86. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 1”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

87. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 1” and to distribute same to the public in sound or written form.

88. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 1” subject to U.S. Copyright Registration Application by

copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 13. INFRINGEMENT OF COPYRIGHT Application No. 1-3071958551**

89. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

90. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 1”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

91. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 1” and to distribute same to the public in sound or written form.

92. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 1” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 14. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068302**

93. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

94. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 2”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

95. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 1” and to distribute same to the public in sound or written form.

96. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 2” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 15. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068302**

97. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

98. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 2”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

99. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 2” and to distribute same to the public in sound or written form.

100. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 2” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2nd Edition).

**COUNT 16. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068349**

101. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

102. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 3”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

103. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 3” and to distribute same to the public in sound or written form.

104. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 3” subject to U.S. Copyright Registration Application by

copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 17. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068349**

105. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

106. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 3”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

107. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 3” and to distribute same to the public in sound or written form.

108. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 3” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2nd Edition).

**COUNT 18. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068636**

109. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

110. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 4”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

111. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 4” and to distribute same to the public in sound or written form.

112. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 4” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 19. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068636**

113. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

114. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 4”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

115. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 4” and to distribute same to the public in sound or written form.

116. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 4” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 20. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068813**

117. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

118. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 5”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

119. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 5” and to distribute same to the public in sound or written form.

120. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 5” subject to U.S. Copyright Registration Application by

copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 21. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068813**

121. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

122. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 5”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

123. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 5” and to distribute same to the public in sound or written form.

124. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 5” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 22. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068900**

125. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

126. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 6”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

127. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 6” and to distribute same to the public in sound or written form.

128. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 6” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 23. INFRINGEMENT OF COPYRIGHT Application No. 1-3072068900**

129. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

130. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound

recording of the performance of the lecture “Rounds and Races Part 6”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

131. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 6” and to distribute same to the public in sound or written form.

132. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 6” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 24. INFRINGEMENT OF COPYRIGHT Application No. 1-3072069087**

133. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

134. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 7”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

135. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 7” and to distribute same to the public in sound or written form.

136. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 7” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 25. INFRINGEMENT OF COPYRIGHT Application No. 1-3072069087**

137. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

138. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 7”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

139. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 7” and to distribute same to the public in sound or written form.

140. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 7” subject to U.S. Copyright Registration Application by

copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 26. INFRINGEMENT OF COPYRIGHT Application No. 1-3072069184**

141. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

142. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 8”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

143. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 8” and to distribute same to the public in sound or written form.

144. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 8” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 27. INFRINGEMENT OF COPYRIGHT Application No. 1-3072069184**

145. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

146. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 8”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

147. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 8” and to distribute same to the public in sound or written form.

148. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 8” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 28. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101231**

149. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

150. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound

recording of the performance of the lecture “Rounds and Races Part 9”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

151. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 9” and to distribute same to the public in sound or written form.

152. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 9” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 29. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101231**

153. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

154. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 9”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

155. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 9” and to distribute same to the public in sound or written form.

156. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 9” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 30. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101430**

157. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

158. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 10”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

159. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 10” and to distribute same to the public in sound or written form.

160. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 10” subject to U.S. Copyright Registration Application

by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 31. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101430**

161. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

162. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Rounds and Races Part 10”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

163. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Rounds and Races Part 10” and to distribute same to the public in sound or written form.

164. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Rounds and Races Part 10” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 32. INFRINGEMENT OF COPYRIGHT Application No. 1-3074863550**

165. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

166. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Kingdom of Man & His Godself”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

167. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Kingdom of Man & His Godself” and to distribute same to the public in sound or written form.

168. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Kingdom of Man & His Godself” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 33. INFRINGEMENT OF COPYRIGHT Application No. 1-3074863550**

169. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

170. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Kingdom of Man & His Godself”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

171. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Kingdom of Man & His Godself” and to distribute same to the public in sound or written form.

172. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Kingdom of Man & His Godself” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 34. INFRINGEMENT OF COPYRIGHT Application No. 1-3074767477**

173. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

174. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Twenty-Third Psalm”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

175. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Twenty-Third Psalm” and to distribute same to the public in sound or written form.

176. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Twenty-Third Psalm” subject to U.S. Copyright Registration Application by

copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 35. INFRINGEMENT OF COPYRIGHT Application No. 1-3074767477**

177. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

178. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Twenty-Third Psalm”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

179. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Twenty-Third Psalm” and to distribute same to the public in sound or written form.

180. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Twenty-Third Psalm” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 36. INFRINGEMENT OF COPYRIGHT Application No. 1-3074605082**

181. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

182. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “MEDITATION & KRYIA INITIATION”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

183. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “MEDITATION & KRYIA INITIATION” and to distribute same to the public in sound or written form.

184. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording “MEDITATION & KRYIA INITIATION” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 37. INFRINGEMENT OF COPYRIGHT Application No. 1-3074605082**

185. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

186. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “MEDITATION & KRYIA INITIATION”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

187. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “MEDITATION & KRYIA INITIATION” and to distribute same to the public in sound or written form.

188. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “MEDITATION & KRYIA INITIATION” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 38. INFRINGEMENT OF COPYRIGHT Application No. 1-3074604782**

189. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

190. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “MEDITATION GIVEN IN TULSA”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

191. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “MEDITATION GIVEN IN TULSA” and to distribute same to the public in sound or written form.

192. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “MEDITATION GIVEN IN TULSA” subject to U.S. Copyright Registration

Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 39. INFRINGEMENT OF COPYRIGHT Application No. 1-3074604782**

193. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

194. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “MEDITATION GIVEN IN TULSA”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

195. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “MEDITATION GIVEN IN TULSA” and to distribute same to the public in sound or written form.

196. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “MEDITATION GIVEN IN TULSA” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 40. INFRINGEMENT OF COPYRIGHT Application No. 1-3072572260**

197. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

198. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Saturday Spring Retreat Kingdom Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

199. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Saturday Spring Retreat Kingdom Lecture” and to distribute same to the public in sound or written form.

200. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Saturday Spring Retreat Kingdom Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 41. INFRINGEMENT OF COPYRIGHT Application No. 1-3072572260**

201. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

202. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound

recording of the performance of the lecture “Saturday Spring Retreat Kingdom Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

203. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Saturday Spring Retreat Kingdom Lecture” and to distribute same to the public in sound or written form.

204. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Saturday Spring Retreat Kingdom Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 42. INFRINGEMENT OF COPYRIGHT Application No. 1-3072209212**

205. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

206. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “NO TITLE”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

207. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “NO TITLE” and to distribute same to the public in sound or written form.

208. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "NO TITLE" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 43. INFRINGEMENT OF COPYRIGHT Application No. 1-3072209212**

209. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

210. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture "NO TITLE". The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

211. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce "NO TITLE" and to distribute same to the public in sound or written form.

212. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "NO TITLE" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami." (2<sup>nd</sup> Edition).

**COUNT 44. INFRINGEMENT OF COPYRIGHT Application No. 1-3072196193**

213. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

214. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Friday Night Spring Retreat Kingdom Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

215. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Friday Night Spring Retreat Kingdom Lecture” and to distribute same to the public in sound or written form.

216. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Friday Night Spring Retreat Kingdom Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 45. INFRINGEMENT OF COPYRIGHT Application No. 1-3072196193**

217. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

218. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound

recording of the performance of the lecture “Friday Night Spring Retreat Kingdom Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

219. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Friday Night Spring Retreat Kingdom Lecture” and to distribute same to the public in sound or written form.

220. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Friday Night Spring Retreat Kingdom Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 46. INFRINGEMENT OF COPYRIGHT Application No. 1-3072195727**

221. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

222. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “NO TITLE” also known as “5 Streams/Time of Refinement”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

223. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “NO TITLE” also known as “5 Streams/Time of Refinement” and to distribute same to the public in sound or written form.

224. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “NO TITLE” also known as “5 Streams/Time of Refinement” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 47. INFRINGEMENT OF COPYRIGHT Application No. 1-3072195727**

225. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

226. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “NO TITLE” also known as “5 Streams/Time of Refinement”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

227. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “NO TITLE” also known as “5 Streams/Time of Refinement” and to distribute same to the public in sound or written form.

228. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “NO TITLE” also known as “5 Streams/Time of Refinement” subject to U.S.

Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 48. INFRINGEMENT OF COPYRIGHT Application No. 1-3072195727**

229. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

230. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “NO TITLE” also known as “5 Streams/Time of Refinement”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

231. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “NO TITLE” also known as “5 Streams/Time of Refinement” and to distribute same to the public in sound or written form.

232. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “NO TITLE” also known as “5 Streams/Time of Refinement” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Meditation/Ancient Teachings of the Masters”.

**COUNT 49. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101970**

233. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

234. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 1”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

235. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 1” and to distribute same to the public in sound or written form.

236. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 1” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 50. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101970**

237. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

238. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 1”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

239. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 1” and to distribute same to the public in sound or written form.

240. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 1” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 51. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101970**

241. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

242. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 1”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

243. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 1” and to distribute same to the public in sound or written form.

244. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 1” subject to U.S. Copyright Registration Application by copying and

placing upon the market with the intent to sell a book titled “Meditation/Ancient Teachings of the Masters”.

**COUNT 52. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101875**

245. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

246. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 3”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

247. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 3” and to distribute same to the public in sound or written form.

248. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 3” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 53. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101875**

249. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

250. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 3”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

251. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 3” and to distribute same to the public in sound or written form.

252. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 3” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 54. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101517**

253. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

254. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “LOVE”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

255. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “LOVE” and to distribute same to the public in sound or written form.

256. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “LOVE” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 55. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101517**

257. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

258. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “LOVE”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

259. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “LOVE” and to distribute same to the public in sound or written form.

260. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “LOVE” subject to U.S. Copyright Registration Application by copying and

placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 56. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101634**

261. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

262. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Easter Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

263. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Easter Lecture” and to distribute same to the public in sound or written form.

264. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Easter Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 57. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101634**

265. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

266. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Easter Lecture”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

267. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Easter Lecture” and to distribute same to the public in sound or written form.

268. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Easter Lecture” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 58. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101711**

269. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

270. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “LAW OF OPULANCE”. The work is the

subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

271. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “LAW OF OPULANCE” and to distribute same to the public in sound or written form.

272. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “LAW OF OPULANCE” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 59. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101711**

273. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

274. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “LAW OF OPULANCE”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

275. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “LAW OF OPULANCE” and to distribute same to the public in sound or written form.

276. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "LAW OF OPULANCE" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami." (2<sup>nd</sup> Edition).

**COUNT 60. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101808**

277. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

278. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture "Parables # 2". The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

279. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce "Parables # 2" and to distribute same to the public in sound or written form.

280. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "Parables # 2" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 61. INFRINGEMENT OF COPYRIGHT Application No. 1-3072101808**

281. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

282. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parables # 2”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

283. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parables # 2” and to distribute same to the public in sound or written form.

284. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parables # 2” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**COUNT 62. INFRINGEMENT OF COPYRIGHT Application No. 1-3074997427**

285. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

286. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parable Of The Prodigal Son”. The work is the

subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

287. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parable Of The Prodigal Son” and to distribute same to the public in sound or written form.

288. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “Parable Of The Prodigal Son” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.”

**COUNT 63. INFRINGEMENT OF COPYRIGHT Application No. 1-3074997427**

289. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

290. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “Parable Of The Prodigal Son”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

291. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “Parable Of The Prodigal Son” and to distribute same to the public in sound or written form.

292. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "Parable Of The Prodigal Son" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami." (2<sup>nd</sup> Edition).

**COUNT 64. INFRINGEMENT OF COPYRIGHT Application No. 1-3075223552**

293. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

294. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture "MEDITATION". The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

295. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce "MEDITATION" and to distribute same to the public in sound or written form.

296. Defendant willfully infringed Plaintiff's copyrighted work, the text of the recording "MEDITATION" subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled "Audle Allison the Great American Swami."

**COUNT 65. INFRINGEMENT OF COPYRIGHT Application No. 1-3075223552**

297. Plaintiff incorporates by reference the paragraphs set forth above and further alleges:

298. Plaintiff is, and at all relevant times has been, the copyright owner of exclusive rights by assignment under United States copyright law with respect to namely the sound recording of the performance of the lecture “MEDITATION”. The work is the subject of a valid US Copyright Registration Application for which the Plaintiff is the current owner.

299. Among the exclusive rights granted to the Plaintiff under the Copyright Act are the exclusive rights to reproduce “MEDITATION” and to distribute same to the public in sound or written form.

300. Defendant willfully infringed Plaintiff’s copyrighted work, the text of the recording “MEDITATION” subject to U.S. Copyright Registration Application by copying and placing upon the market with the intent to sell a book titled “Audle Allison the Great American Swami.” (2<sup>nd</sup> Edition).

**PRAAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

A. For an injunction providing:

“Defendant shall be and hereby is enjoined from directly or indirectly infringing Plaintiff’s rights under federal or state law in the Copyrighted Works and any art work, whether now in existence or later created, that is

owned or controlled by Plaintiff, Defendant also shall destroy all copies of Plaintiff's Work and shall destroy all copies of those in any physical medium or device in Defendant's possession, custody, or control."

B. That the Defendant serve upon Plaintiff or its counsel, within ten (10) days after the entry of an injunction, a written report under oath setting forth in detail the manner in which Defendant have complied with the injunction;

C. That Defendant pay damages in an amount determined at trial, which damages include, without limitation:

- i. Plaintiff's actual damages and any additional profits of the Defendant; and or
- ii. Statutory damages pursuant to 17 U.S.C. § 504 in an amount to be determined.
- iii. Judgment against Defendant for reasonable attorney fees and all costs of these proceedings pursuant to 17 U.S.C. § 505.

D. Judgment against Defendant granting such other and further relief as is just and equitable.

Respectfully submitted,  
s/ Martin G. Ozinga

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